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## Counsel for Defendant **Bryan Lee**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

\* \* \*

UNITED STATES OF AMERICA,  
Plaintiff.

Case No. 4:22-CR-03077-JMG-CRZ

NEIL SURESH CHANDRAN and BRYAN LEE

## Defendants.

**DEFENDANT BRYAN LEE'S MOTION FOR JOINDER TO DEFENDANT  
CHANDRAN'S MOTION TO TRANSFER VENUE TO THE DISTRICT OF  
NEVADA (ECF No. 99)**

## MOTION TO TRANSFER VENUE

1. On July 6, 2023, co-defendant Neil Suresh Chandran filed a Motion to Transfer Venue. (See Electronic Court Filing (ECF) No. 99.) Mr. Chandran concurrently filed a Brief in Support of Motion to Transfer Venue. (See ECF No. 100.)

2. That counsel for defendant Bryan Lee has reviewed both filings and hereby joins, adopts, and incorporates all of the arguments presented therein including any relevant exhibits and attachments.

3. That Mr. Lee respectfully requests that this Court allow him to join Mr. Chandran's Motion to Transfer Venue and that this Court transfer the instant prosecution to the District of Nevada pursuant to Federal Rule of Criminal Procedure 21(b).

4. That Mr. Lee is filing a brief in support of his Motion for Joinder contemporaneously with this Motion. In that brief, Mr. Lee maintains that the Mr. Chandran's argument for a venue change to the District of Nevada is well-supported by the law and factual record. Further, those arguments apply with more force to Mr. Lee because, *inter alia*, he currently lives and resides in Las Vegas, his counsel resides in Las Vegas, and the government indicted Mr. Lee recently thereby reducing any risk of undue delay attendant to transferring the matter.

5. That counsel for Mr. Lee respectfully requests to be present for any hearings or matters set regarding the pending Motion to Transfer Venue.

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1 WHEREFORE, Mr. Lee respectfully requests that this Court allow him to join  
2 Mr. Chandran's Motion to Transfer Venue to the United States Court for the District  
3 of Nevada and that this Court grant that Motion pursuant to the terms and  
4 requirements of Federal Rule of Criminal Procedure 21(b).

5 Dated this 14th Day of July 2023.

6 /s/ Joshua Tomsheck  
7 JOSHUA TOMSHECK, ESQ.  
8 Nevada State Bar No. 9210  
9 Attorney for Defendant Bryan Lee  
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## CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2023, I electronically filed the foregoing with the Clerk of the Court for the United States District Court, District of Nevada by using the CM/ECF system.

Participants in the case who are registered CM/ECF users will be served by the CM/ECF system and include: AUSA William Johnson.

I further certify that defendant Bryan Lee is not a registered CM/ECF users. I will ensure that this office provides Mr. Lee with a copy of this pleading at or about the time of filing.

/s/ Sarah Daniels

An Employee of Hofland & Tomsheck  
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